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April 25, 2017

BY HAND AND ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Cessna Finance Corporation v. Al Ghaith Holding Company PJSC,
15 Civ. 9857 (PGG)

Dear Judge Gardephe,

This firm represents Petitioner Cessna Finance Corporation (“Cessna”) in the above referenced matter.

Cessna initiated this action on December 17, 2015, with the filing of a Petition seeking an order confirming, under the Federal Arbitration Act, 9 U.S.C. §§ 1 et seq. (the “FAA”), and the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, 9 U.S.C. §§ 201-208 (the “Convention”), a \$51,747,681.96¹ arbitration award rendered by an ICC International Court of Arbitration tribunal seated in New York City on October 26, 2015 (the “Award”) against Al Ghaith Holding Company PJSC (“Al Ghaith”).

On February 26, 2016, Al Ghaith filed a Notice of Cross-Petition (ECF Dkt. No. 16) seeking an order, pursuant to the FAA and the Convention, vacating the Award on the grounds that in rendering it the arbitrators acted in “manifest disregard” of applicable law. As of April 20, 2016, briefing on the Cross-Petition was complete. At the time of filing neither party sought oral argument pursuant to Rule IV(D) of Your Honor’s Individual Rules of Practice in Civil Cases. Now, however, we ask whether the Court might find it useful to schedule argument or a preliminary conference.

¹ Plus post-Award interest.



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Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, reading 'Chris Allegaert', with a stylized flourish at the end.

Christopher Allegaert

cc: Allan M. Bahn, Esq. (Counsel for Cross-Petitioner
Al Ghaith Holding Company PJSC) (by ECF)